

Exhibit 1

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April 30, 2020

BY ELECTRONIC MAILDavid Jeffries, Esq.
Martin E. Restituyo, Esq.
1345 Avenue of the Americas, 33rd Floor
New York, NY 10105*Kaloma Cardwell v. Davis Polk & Wardwell LLP, et al.*
(Case No. 1:19-cv-10256-GHW)

Dear David, Martin:

We hope that this finds you and your families safe and well.

We write concerning two issues: First, on March 2, 2020, pursuant to the Court's December 20, 2019 Case Management Plan and Scheduling Order (ECF 27), defendants served requests for production of documents ("RFPs") and interrogatories, responses and objections to which were due by Thursday, April 2, 2020. Plaintiff failed to, and therefore has waived, any objections to these discovery requests. Please provide us with a definitive schedule by which you intend to answer the interrogatories and begin/complete your document production (which we expect will include, at a minimum, the documents Mr. Cardwell "has in his possession" concerning his work product,

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performance, administrative action, and complaint, as described in your amended initial disclosures).

Second, in February, we agreed to conduct a mediation before [REDACTED] on May 12. The current public health crisis will prevent the parties from participating in an in-person mediation in two weeks; accordingly, we have informed [REDACTED] that the parties will propose alternative dates once conditions have changed.

We recognize the serious disruptions caused by the present crisis, and remain willing to discuss these issues if helpful. We look forward to receiving your production of documents and answers to our interrogatories promptly, so that the parties can continue to abide the schedule imposed by the Court.

Many thanks,

/s/ Susanna Buerger

Susanna Buerger